



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

October 4, 2024

BY ECF & EMAIL

Honorable Arun Subramanian
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Sean Combs, 24 Cr. 542 (AS)*

Dear Judge Subramanian:

Enclosed for the Court's consideration is a Proposed Protective Order in the above-captioned case that has been executed by both parties. The parties respectfully request that the Court enter the Proposed Protective Order.

Please note that the Government has redacted a limited portion of the publicly-filed Proposed Protective Order. The redacted portion describes with particularity discovery material that implicates a victim's privacy interests. *See Lugosh v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) (finding that the presumption of public access to a judicial document can be overcome when court makes finding that sealing (1) is necessary to preserve higher values and (2) is narrowly tailored to serve that interest). The Government will provide the Court with an unredacted copy directly. Defense counsel does not object to these limited redactions.

Respectfully submitted,

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